

TITLE V COMPLIANCE TRAINING

WORKSHOP MANUAL

**Stationary Source Program
Air Quality Division
Idaho Department of Environmental Quality
May 2003**

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FOCUS ON DEQ ACTIONS



Full Compliance Evaluation (FCE)

- **Comprehensive evaluation of compliance status of entire facility**
- **Addresses current compliance status as well as facility's continuing ability to comply**
- **Addresses all regulated pollutants at all regulated units through compliance with each permit condition**



FCE Elements - DEQ Review

- **Reports including the underlying records, as needed**
- **Reported monitoring data (e.g., CEM, continuous parameter monitoring reports, excess emissions reports)**
- **Annual Compliance Certifications (ACCs)**
- **Semiannual Monitoring Reports (SRs)**
- **Quarterly Compliance Schedule Progress Reports**



FCE Elements - DEQ Review (cont.)

- **Any other reports required by the permit**
- **Assess control device & process operating conditions**
 - Necessity for inspection depends on situation
- **VE observations as needed**
- **Review facility records and operating logs**
- **Assess process parameters (e.g., feed rates, raw material composition, other process rates)**



FCE Elements - DEQ Review (cont.)

- **Assess control equipment performance (e.g., water flow rate, pressure drop, temp, ESP power level, etc.)**
- **Review of stack test results**
- **Completion of FCE involves multiple “steps”**
- **Entered into AIRS upon completion of all steps**



Stack Tests for an FCE

- **Must review results of all stack tests required by permit**
- **Encourage facility to submit protocol for approval**



FCE - Overall Compliance Status Decision

- **A snapshot in time, at completion of FCE**
- **If there are any unresolved violations, facility is listed as “out”**



AIRS and ECHO Databases

- **Aerometric Information Retrieval System (AIRS)**
 - States required to enter specific data into AIRS
 - Limited access - state agencies only
- **Enforcement and Compliance History OnLine (ECHO)**
 - Subset of information contained in AIRS
 - Accessible online to general public
- **FCEs and PCEs and findings are entered in AIRS and may be viewed by general public**



Partial Compliance Evaluation (PCE)

- **Documented compliance assessment focused on a subset of requirements**
- **Purpose:**
 - Capture all state/local activity at significant sources
 - States/locals are recognized for these activities
 - Encourage accurate reporting and promote accuracy in database
 - Encourage greater public accessibility to information



INVESTIGATIONS



Investigations

- **Generally limited to a portion of a facility or a particular issue**
- **Resource and budget intensive**
- **In-depth assessment**
- **Used to address issues that are difficult to evaluate during a routine FCE due to time constraints and complexity of the issue**
- **DEQ Draft Plan - just a few each year**



Investigation Examples

- **NSR/PSD**
- **NSPS applicability**
- **Construction without a PTC**
- **Major source status/failure to get Tier I OP**
- **Possible “*sham*” synthetic minor permits**

Who to Contact for More Information

If your facility is located in Ada, Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, Valley, or Washington County, your points of contact are:

Tim Trumbull, Air Quality Inspector -or-
Tom Krinke, Air Quality Science Officer
DEQ Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
(208) 373-0550
Fax: (208) 373-0287

or

Bill Rogers, Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Blaine, Camas, Cassia, Gooding, Jerome, Lincoln, Minidoka, or Twin Falls County, your points of contact are:

Bill Allred, Regional Manager/Air and Remediation -or-
Stephen VanZandt, Air Quality Science Officer
DEQ Twin Falls Regional Office
601 Pole Line Rd., Suite 2
Twin Falls, ID 83301
(208) 736-2190
Fax: (208) 736-2194

or

Bill Rogers, Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Bannock, Bear Lake, Bingham, Caribou, Franklin Oneida, or Power County, your points of contact are:

Rick Elkins, Inspection/Compliance Coordinator -or-
Larry Sims, Permit/Monitoring Coordinator
DEQ Pocatello Regional Office
444 Hospital Way, #300
Pocatello, ID 83201
(208) 236-6160
Fax: (208) 236-6168

or

Mike Simon
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Lemhi, Madison, or Teton County, your points of contact are:

Rensay Owen, Regional Manager-Air Quality -or-
Jorge Garcia, Air Quality Analyst
DEQ Idaho Falls Regional Office
900 N. Skyline, Suite B
Idaho Falls, ID 83402
(208) 528-2650
Fax: (208) 528-2695

or

Mike Simon
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-015

If your facility is located in Benewah, Bonner, Boundary, Kootenai, or Shoshone County, your points of contact are:

Tom Harman, Air Quality Manager
DEQ Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
(208) 769-1422
Fax: (208) 769-1404

or

Bill Rogers
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Clearwater, Idaho, Nez Perce, Latah, or Lewis County, your points of contact are:

Eric Kopczynski
Air Quality Analyst
DEQ Lewiston Regional Office
1118 "F" Street
Lewiston, ID 83501
(208) 799-4370, or toll free at 877-541-3304
Fax: (208) 799-3451

or

Mike Simon
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154